

July 20, 2020

United States Environmental Protection Agency,

This request is made on behalf of myself under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552.

I am currently a retired developmental neurotoxicologist and private citizen working on a project that aims to support the transition from animal-based testing to the use of alternative non-animal testing methods for assessing the potential developmental neurotoxicity hazards of chemicals. To this end, the goal of my project is to: 1) facilitate the development of non-animal alternative models for development neurotoxicity by informing the comparison to in vivo results; and, 2) make this data publicly available by publication in a peer reviewed journal or other publicly accessible format. I note that this goal is in line with the Administrator Wheeler's statement on 09/10/2019 to reduce animal testing by 30% in 2025.

Subsequent to my previous request (FOIA request EPA-2020-003946) for all Developmental Neurotoxicity Studies that have been submitted to the Office of Pesticide Products, I am now requesting copies of the Data Evaluation Records/Reviews for the studies listed below. I have provided both an MRID number as well as the Citation Reference.

- 46779204 Pitt, J. (2006) A Validation Study for Developmental Neurotoxicity Endpoints at WIL Research Laboratories, Inc.: Effect of Propylthiouracil (PTU) on Developmental Neurotoxicity Endpoints in Crl:CD (SD) IGS BR Rats (WIL-99126). Project Number: WIL/99126. Unpublished study prepared by WIL Research Laboratories, Inc. 17 p.
- 47293901 Van Goethem, D.; Sheets, L.; Hoss, H.; et al. (2007) A Developmental Neurotoxicity Screening Study with Technical Grade SXX 0665 in Wistar Rats (Bayer Study No. 03-D72-NW). Project Number: 03/D72/NW, 200958/1. Unpublished study prepared by Bayer Cropscience LP. 141 p.
- 48176416 Gilmore, R. (2010) A Developmental Neurotoxicity Study with Technical Grade Propineb in Wistar Rats: Final Report. Project Number: M/370251/01/1, 08/D72/OV, 08/D72/OV/OCR. Unpublished study prepared by Xenometrics, LLC. 1340 p.
- 49928401 Coder, P. (2016) An Oral Developmental Neurotoxicity Study of Propylthiouracil in Rats (Supplemental to the Thiabendazole Developmental Thyroid Studies MRIDs 49928301 and 49928302): Final Report. Project Number: TK0319754, WIL/99126. Unpublished study prepared by Charles River Laboratories Ashland, LLC. 257p.
- 47116201 Moxon, M. (2007) Abamectin: Assessment of Developmental Neurotoxicity in Rats: Final Report. Project Number: RR1086/REG, RR1086, T000516/07. Unpublished study prepared by Central Toxicology Lab. (Syngenta). 2233 p. Relates to L0001119.
- 46727403 Moxon, M. (2005) Abamectin: Developmental Neurotoxicity Study in Rats: Final Report. Project Number: RR1048/REG, T000967/05. Unpublished study prepared by Central Toxicology Lab. (Syngenta). 2445 p.
- 46046401 Pinto, P. (2002) CGA-245704 (Acibenzolar-s-Methyl): Developmental Neurotoxicity Study in Rats: Final Report. Project Number: RR0930, 2752/01. Unpublished study prepared by Central Toxicology Lab. (Syngenta). 2093 p.
- 45441301 Sheets, L.; Lake, S. (2001) A Developmental Neurotoxicity Screening Study with Technical Grade MKH 3586 in Wistar Rats: Lab Project Number: 98-472-VL: 109811. Unpublished study prepared by Bayer Corporation. 1458 p. {OPPTS 870.6300}

45711201 Lake, S.; Sheets, L. (2002) A Developmental Neurotoxicity Screening Study with Technical Grade Azinphos-Methyl (GUTHION) in Wistar Rats: Lab Project Number: 01- D72-CI: G200115. Unpublished study prepared by Bayer Corp. 1156 p. {OPPTS 870.6300}

46054101 Sheets, L.; Lake, S. (2003) A Developmental Neurotoxicity Screening Study with Technical Grade Beta-Cyfluthrin in Wistar Rats. Project Number: 02/D72/IS, 200620, CY521801. Unpublished study prepared by Bayer Corp. 1134 p.

Please note that I do not require printed versions of any of this information. An electronic file is acceptable and preferred.

Working on the research project is aimed in the public interest, and I ask that all fees be waived as per 40 C.F.R. § 2.107(l)(2)(i)-(iv) based on the following reasons. 1) The subject of the request is important given the need to better understand the possible role of environmental chemicals in the increases in neurodevelopmental disorders within the US. 2) The limited testing of the vast majority of said chemicals has spurred public interest in development of new alternative testing methods that are more cost and time efficient. And the validity of these new methods cannot be assessed without comparison to existing validated tests used by regulatory authorities (this is the goal of the current project). 3) publication of the findings of this project in a peer reviewed journal or other publicly accessible format will inform an understanding of the subject by the public. (4) the significance of the output from this project is to that it will provide crucial information that enables a better public understanding of the potential for new alternative testing methods to rapidly and efficiently screen chemicals for developmental neurotoxicity, and how these methods compare to those currently used to regulate exposure to said chemicals.

I have no commercial interest in the requested information. If the request for fee waiver is denied and fees are expected to exceed \$50.00, kindly notify me by telephone to this effect before this disclosure request is processed. If you have any questions pertaining to any aspect of this request, please call me at 1-919-806-9316 or email me at [croftonwork@outlook.com](mailto:croftonwork@outlook.com).

Thank you for your assistance. I look forward to receiving your reply.

Sincerely,

Kevin M. Crofton  
2311 Wilson St  
Durham NC 27705